

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

United States of America
v.

Omari Rashad Moore

Case No. 25-mj-4059

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 4, 2025 in the county of Davidson in the
Middle District of Tennessee, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. §§ 922(g)(1) and 924

Felon in possession of a firearm

This criminal complaint is based on these facts:

See Attached affidavit

☒ Continued on the attached sheet.

/s/ Joseph Heino

Complainant's signature

Joseph Heino, Special Agent

Printed name and title

Sworn to me remotely by telephone, in compliance with
Fed. R. Crim. P. 4.1.

Date: February 12, 2025

City and state: Nashville, Tennessee



Alistair Newbern
Judge's signature

U.S. Magistrate Judge Alistair E. Newbern

Printed name and title

STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT

I, Joseph Heino, a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the ATF and have been so employed since September 2023. I am currently assigned to the Nashville Field Division. Prior to being employed by the ATF, I was employed by the Escambia County Sheriff’s Office, Florida, beginning in 2018. While with the Escambia County Sheriff’s Office, I worked in uniformed patrol for approximately three years. After my assignment in uniformed patrol, I worked as an investigator for approximately two years in the Escambia County Sheriff’s Office Gun Crimes Unit.

2. In my law enforcement career, I have participated in numerous criminal investigations, including those that fall under the investigative jurisdiction of ATF such as violations involving the unlawful manufacture, sale, and possession of firearms and controlled substances.

3. The following information contained in this Affidavit is based on my training and experience, as well as information provided to me by other law enforcement officials, and my review of investigative documents and other materials. I have not included all of the facts of the investigation and have only included the facts that are necessary to establish probable cause for the requested Criminal Complaint and arrest warrant. Any conversations contained herein are not verbatim and are only related in substance and part, except where a conversation includes quotations.

4. This Affidavit is submitted in support of a Criminal Complaint for the arrest of **Omari Rashad MOORE (“MOORE”)** for being a Felon in Possession of a Firearm, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

PROBABLE CAUSE

5. On February 4, 2025, the Metropolitan Nashville Police Department (“MNPDP”) responded to the Mall at Green Hills, which is located at 2126 Abbott Martin Road, Nashville, Tennessee, in reference to a possible robbery and shots-fired complaint. As MNPDP officers responded to the Mall at Green Hills, 911 dispatch also received a shooting complaint near the I–65 South and I–440 Interstate interchange in Nashville. This interchange is approximately five miles driving distance from the Mall at Green Hills.

6. MNPDP officers arrived at the Mall at Green Hills and observed, near where the shooting and robbery had allegedly occurred, two .10 millimeter cartridge casings on the ground along with a high capacity magazine containing .10 millimeter ammunition. MNPDP officers could not locate a victim or suspect of the shooting at the mall.

7. MNPDP officers arrived in the area of the I–65 South and I–440 Interstate interchange and observed a silver Tesla vehicle that had crashed into a tree. The Tesla had been traveling away from the direction of the Mall at Green Hills on I–440. MNPDP officers recovered two Louis Vuitton bags from inside the Tesla. MNPDP officers located two males near the crash scene. They were identified as **MOORE** and SUBJECT 1. MNPDP officers observed that SUBJECT 1 had multiple gunshot wounds. SUBJECT 1 was transported to Vanderbilt Hospital by emergency medical services, where he was pronounced dead a short time later. MNPDP officers

observed that **MOORE** was of a thinner build and was wearing all black clothing. SUBJECT 1 was of a heavier build and was wearing a white shirt.

8. A bystander, who witnessed the aftermath of the crash, was interviewed by MNPD officers. The bystander told MNPD officers that he/she had observed **MOORE** approach a nearby guardrail on foot after the Tesla crashed. MNPD officers went to the area of the guardrail noted by the bystander and located a Glock Model: 29, Caliber: .10 millimeter pistol bearing serial number BEVB197 near the guardrail with the magazine missing.

9. MNPD Detectives arrived at the Mall at Green Hills and reviewed security footage of the robbery and shooting. The footage depicted the following:

- a. A male, hereinafter referred to as SUBJECT 2, wearing all blue clothing walking away from the mall carrying two shopping bags. As SUBJECT 2 walked towards a vehicle, a silver Tesla vehicle was parked nearby. The Tesla then left its parking spot and drove around before returning and stopping near SUBJECT 2's vehicle.
- b. A man, who appeared to be a man of thinner build wearing all black clothing, exited the Tesla's front passenger door with an object in his pocket that was consistent with the appearance of a handgun loaded with a high-capacity magazine.
- c. The man approached SUBJECT 2 at SUBJECT 2's vehicle. A fight ensued between the two males, and eventually SUBJECT 2 broke free and ran from his vehicle.
- d. The male wearing all black clothing appears to lean into SUBJECT 2's vehicle before running back to the Tesla with what appears to be the two shopping bags SUBJECT 2 had been carrying earlier. The male wearing all black clothing climbed into the Tesla's front passenger seat.

e. SUBJECT 2 ran up to the Tesla and began hitting the Tesla, which drove away.

SUBJECT 2 then entered a silver SUV and left.

10. MNPB detectives made contact with staff at the Louis Vuitton store inside the mall. MNPB detectives reviewed video surveillance and observed SUBJECT 2 at the register purchasing items with cash. Louis Vuitton staff provided MNPB detectives with a receipt that had the name of SUBJECT 2 as the purchaser of the items.

11. MNPB detectives interviewed **MOORE**, who provided the following statement after being read his *Miranda* Rights. **MOORE** stated he was in the Tesla with SUBJECT 1, who was driving the vehicle. **MOORE** stated they were then shot at by an unknown individual and that SUBJECT 1 was struck by gunfire. **MOORE** stated that the vehicle then crashed. **MOORE** did not admit to being present at the Mall at Green Hills prior to the shooting and crash.

12. A check of **MOORE's** criminal history revealed that he has multiple felony convictions, including for the following offenses:

- a. In 2023, **MOORE** was convicted in Henderson County (TN), Case Number 21-224-2, for Evading Arrest Vehicle – Risk of Death and was sentenced to a three-year prison sentence.
- b. In 2023, **MOORE** was convicted in Henderson County (TN), Case Number 21-224-2, for Reckless Endangerment – Vehicle/Felony and was sentenced to a two-year prison sentence.
- c. In 2023, **MOORE** was convicted in Henderson County (TN), Case Number 21-224-2, for Theft of Property - \$10,000 to \$60,000 and was sentenced to a three-year prison sentence.

- d. In 2022, **MOORE** was convicted in Davidson County (TN), Case Number 2020-A-344, for Burglary and was sentenced to two years of incarceration.
- e. In 2022, **MOORE** was convicted in Davidson County (TN), Case Number 2020-A-618, for Theft of Property over \$1,000 and under \$2,500 and was sentenced to two years of incarceration.

13. An ATF Firearms Nexus Expert examined photographs of the aforementioned Glock pistol and determined that the pistol is a “firearm” within the meaning of Title 18, United States Code, Section 921(a)(3). The Firearms Nexus Expert also determined that the firearm was not manufactured in the State of Tennessee, meaning that the firearm had necessarily traveled in and affected interstate commerce prior to **MOORE’s** possession of it on or about February 4, 2025.

14. Given the fact that **MOORE** was previously convicted of several felony offenses and sentenced to multiple years in prison for each offense, I submit that there is probable cause to believe that **MOORE** knew of his status as a convicted felon prior to February 4, 2025.

15. All of these events occurred in the Middle District of Tennessee.

16. Based upon the foregoing facts, I submit that there is probable cause to believe that **MOORE** committed the offense of being a Felon in Possession of a Firearm, in violation of Title 18, United States Code Sections 922(g)(1) and 924.